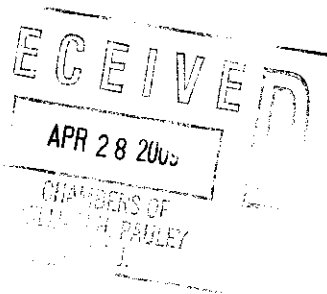
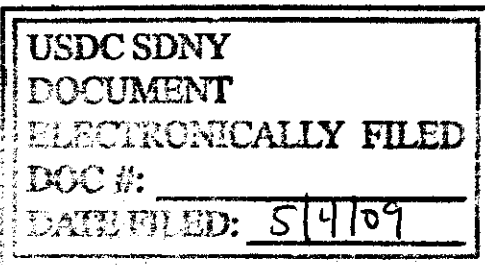


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April 24, 2009

Hon. William H. Pauley, III
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2210
New York, New York 10007-1312

Application granted.

SO ORDERED:

[Signature]
WILLIAM H. PAULEY III U.S.D.J.
5/1/09

Re: *The Corcoran Law Group, LLC and Hudson City Bankcorp, Inc. d/b/a Hudson v. Jane Y. Posner, Esq., Posner, Posner & Associates P.C. and John and Jane Doe*
Docket No.: 09-CV-1861(WHP)
RR File No.: 009104-00026

This Court will hold a pre-motion conference on May 8, 2009 at 12:00 p.m.

Dear Judge Pauley:

This office represents the defendants in the above referenced case. Pursuant to Your Honor's rules, the purpose of this letter is to request a pre-motion conference as the defendants want to make a motion to stay this action pending the resolution of a related criminal proceeding against the defendants. The defendants also respectfully request in the interim that Your Honor adjourn defendants' time to serve their answer, which is currently due on May 7, 2009, and adjourn the parties obligation to meet and confer regarding discovery until Your Honor has had an opportunity to make a determination on the stay issue.

The complaint in this action asserts eight causes of action against the defendants, an attorney and a law firm, for negligence, legal malpractice, breach of contract, breach of fiduciary duty, conversion, civil conspiracy, unjust enrichment and "intentional tort". The complaint alleges that the plaintiff, The Corcoran Law Group, LLC ("Corcoran") represented the plaintiff, Hudson City Bancorp, Inc., in coordinating the closing of mortgage loans for real estate transactions. It is further alleged that Corcoran retained the defendants as the closing attorney to handle New York real estate closings on behalf of Hudson. The plaintiffs allege that they wire transferred certain funds into the defendants' escrow account and that the defendants misappropriated a portion of those funds.

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Hon. William H. Pauley, III
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On or about March 2, 2009 a felony complaint was filed in the Supreme Court of the State of New York, Putnam County, against the defendants for Grand Larceny in the 2nd Degree wherein it is alleged that the defendant, Jane Posner, stole the aforementioned money that was wire transferred into her escrow account. The criminal proceedings are currently pending.

The purpose of the stay of this civil action is to protect the defendant's privilege against self-incrimination afforded her under the Fifth Amendment of the United States Constitution. In deciding whether to stay a civil action until the outcome of a related pending criminal action the Courts look at six factors: (1) the extent to which the issues in the criminal and civil cases overlap; (2) the status of the criminal case; (3) the private interest of the plaintiff in proceeding expeditiously weighed against the prejudice to the plaintiff caused by the delay; (4) the private interests of and the burden on the defendants; (5) the interests of the courts; and (6) the public interest. See Sterling National Bank v. A-1 Hotels International, Inc., 175 F. Supp.2d 573 (S.D.N.Y. 2001). As will be further discussed at the pre-motion conference, the defendants respectfully submit that when weighing each of the six factors it is prudent and an appropriate exercise of this Court's discretion to stay this action pending the outcome of the criminal proceeding.

An initial case conference has already been scheduled for May 8, 2008 at 12:00 p.m. It is respectfully suggested that the pre-motion conference occur at that time.

Respectfully yours,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read "Douglas Tischler".

Douglas Tischler

cc: Dennis J.Drasco, Esq.

DT:eir

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